

In the Circuit Court of Franklin County
Associate Judge Division
State of Missouri

Victoria Whitworth,

Plaintiff,

Vs.

Monarch Recovery Management, Inc.
Serve: Monarch Recovery Management,
Inc.
10965 Decatur Rd.
Philadelphia, PA 19154

Case No. 12AB-ACO1015

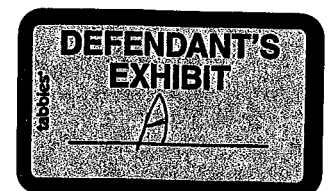
Division No. 6

FILED
MAY 11 2012
BY BILLY MILLER, Clerk
FRANKLIN COUNTY MISSOURI

PETITION FOR DAMAGES
TELEPHONE CONSUMER PROTECTION ACT

1. Plaintiff Victoria Whitworth is a resident of Franklin County, Missouri.
2. Defendant Monarch Recovery Management, Inc. is a Pennsylvania Corporation with its business location and registered agent located in Philadelphia County, Pennsylvania.
3. During 2011 and 2012, on information and belief, Defendant placed non-emergency telephone calls to Plaintiff's cellular telephone using an automatic telephone dialing system or pre-recorded or artificial voice without Plaintiff's prior express consent in violation of 47 U.S.C § 227 (b)(1)(A)(iii).

WHEREFORE, Plaintiff prays for judgment against defendant for statutory damages of \$500.00 per call, additional damages of up to \$1,000.00 per call, and for such other and further relief as the Court may deem just and proper in this cause.



Respectfully submitted,



Purschke White Robinson & Becker L.L.C.
Steven R. White MBE 45595, 45595MO
316 E. Locust Street
Union, Missouri 63084
(636) 584-7100 FAX: (636) 583-4887
white@purschkewhite.com
ATTORNEY FOR PLAINTIFF

1883

WHITWORTH, VICTORIA

22976846

IN THE CIRCUIT COURT OF FRANKLIN COUNTY
ASSOCIATE JUDGE DIVISION
STATE OF MISSOURI

VICTORIA WHITWORTH,

Plaintiff,

vs.

MONARCH RECOVERY
MANAGEMENT, INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)

Case Number: 12AB-AC01015

Division VI

NOTICE AND ACKNOWLEDGMENT FOR SERVICE BY MAIL

TO: Monarch Recovery Management, Inc.
10965 Decatur Rd.
Philadelphia, PA 19154

The enclosed summons and petition are served pursuant to Missouri Supreme Court Rule 54.16.

You may sign and date the acknowledgment part of this form and return one copy of the completed form to the sender within thirty days of:

June 6, 2012.

Date

If you are served on behalf of a corporation, unincorporated association, including a partnership, or other entity, you must indicate under your signature your relationship to that entity. If you are served on behalf of another person and you are authorized to receive process, you must indicate under your signature your authority.

If you do not complete and return the form to the sender within thirty days, you or the party on whose behalf you are being served may be required to pay any expenses incurred in serving a summons and petition in any other manner permitted by law.

If you do complete and return this form, you or the party on whose behalf you are being served must comply with the requirements of the summons. If you fail to do so, judgment by default may be taken against you for the relief demanded in the petition.

I DECLARE, UNDER PENALTY OF PERJURY, THAT THIS NOTICE WAS
MAILED ON

June 6, 2012.

Date

Signature:

Carolyn Snelling

ACKNOWLEDGMENT OF RECEIPT OF SUMMONS AND PETITION

I declare, under penalty of filing a false affidavit, that I received a copy of the Summons
and of the Petition in the above captioned matter.

Clayton Cooper
Signature

General Counsel

Relationship to Entity/Authority

Receive Service of Process

6/20/12
Date Signed

I DECLARE, UNDER PENALTY OF PERJURY, THAT THIS NOTICE WAS
MAILED ON

June 6, 2012.

Date

Signature:

Carolyn Snelling

ACKNOWLEDGMENT OF RECEIPT OF SUMMONS AND PETITION

I declare, under penalty of filing a false affidavit, that I received a copy of the Summons
and of the Petition in the above captioned matter.

Cheryl L. Cooper
Signature

CHERYL L. COOPER
Relationship to Entity/Authority
Receive Service of Process

6/20/12
Date Signed